

- 1) Whether EPA’s biogas regulatory reform rule, which was finalized as part of the Final Rule titled “Renewable Fuel Standard (RFS) Program: Standards for 2023-2025 and Other Changes,” published at 88 Fed. Reg. 44,468 (July 12, 2023), is arbitrary and capricious, an abuse of discretion, or otherwise not in accordance with law.

- 2) Whether EPA's biogas regulatory reform rule impermissibly imposes unequal treatment on biogas and renewable natural gas producers.
- 3) Whether EPA's requirements on biogas producers under the biogas regulatory reform rule are arbitrary and capricious, an abuse of discretion, or otherwise not in accordance with law.
- 4) Whether EPA's testing and measurement requirements under the biogas regulatory reform rule are arbitrary and capricious, an abuse of discretion, or otherwise not in accordance with law.
- 5) Whether EPA's biogas regulatory reform rule complied with the notice and comment requirements of the Clean Air Act.

This is a preliminary listing of issues that Petitioner Coalition for Renewable Natural Gas may raise. Petitioner Coalition for Renewable Natural Gas reserves the right to modify this statement of issues, as well as to raise these and other issues.

Respectfully submitted,

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